

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Rudy Heriberto MIGUEL-Citalan (40)
Chiapas, Mexico

Case No.

L-22-MJ-

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 29, 2022 in the county of Webb in the
Southern District of Texas, the defendant(s) violated:

Code Section

18 USC 1001

Offense Description

Whoever, in any matter within the jurisdiction of the executive, legislative, or judicial branch of the Government of the United States, knowingly and willfully

- (1) falsifies, conceals, or covers up by any trick, scheme, or device a material fact;
- (2) makes any materially false, fictitious, or fraudulent statement or representation; or
- (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry.

This criminal complaint is based on these facts:

On or about August 29, 2022, at approximately 8:24 am., defendant, Rudy Heriberto MIGUEL-Citalan, a citizen & national of Mexico applied for admission into the United States at the Lincoln Juarez Port of Entry in Laredo, Texas, as a passenger in a commercial bus. At primary inspection, defendant presented to CBP Officer Maribel Cabello a copy of a State of Arizona birth certificate bearing the name of J.A.G. claiming to be such person. Defendant claimed to be a United States Citizen born in Maricopa, Phoenix. The defendant was referred to secondary for further inspection due to a facial mismatch on CBP Database. At secondary, defendant stated his true name as Rudy Heriberto MIGUEL-Citalan, a citizen and national of Mexico born in Chiapas, Mexico. Defendant admitted he obtained the Arizona Birth Certificate for approximately \$4000.00 U.S. Dollars from an unknown vendor in Zamora, Michoacan, Mexico. Facts are based on the defendant's sworn statement & records of U.S. Customs & Border Protection. The defendant was paroled into the United States & an Immigration hold has been placed.

☐ Continued on the attached sheet.

 /s/ Jose C. Luna

Complainant's signature

 Jose C. Luna, CBP Enforcement Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: August 30, 2022

Judge's signature

City and state: Laredo, Texas

 Christopher Dos Santos, U.S. Magistrate Judge
Printed name and title